UNITED STATES ENVIRONMENTAL PROTECTION AGENCY - REGION II
290 BROADWAY
NEW YORK, NEW YORK 10007-1866

JUL - 3 1997

SUBJECT: Request to Conduct a CERCLA Removal Action at the Central Steel Drum Site, Newark, Essex County, New Jersey - **ACTION MEMORANDUM**

FROM: Gregory B. DeAngelis, On-Scene Coordinator
Response and Prevention Branch

TO: Jeanne M. Fox
Regional Administrator

THRU: Richard L. Caspe, Director
Emergency and Remedial Response Division

Site ID No.: JR

CERCLIS ID No.: NJD011482577

I. PURPOSE

The purpose of this Action Memorandum is to request approval for a removal action to be initiated at the Central Steel Drum Site, 704-738 Doremus Avenue, Block 5074, Lot 1, Newark, New Jersey, 07105. On March 9, 1997, the New Jersey Department of Environmental Protection (NJDEP), requested the United States Environmental Protection Agency (EPA), to conduct a removal assessment to determine the removal action eligibility for this Site under provisions of the Comprehensive Environmental Response, Compensation and Liability Act of 1980 (CERCLA), as amended by 42 U.S.C. § 9601 et. seq. NJDEP referred this Site because of the abandoned flammable and corrosive drums. On March 14-15, 1997, an Expedited Removal Assessment (ERA) was conducted to determine the removal action eligibility for this Site under the provisions of CERCLA. The Site consists of an abandoned drum reconditioning/recycling facility located in Newark. This Action Memorandum provides for site security, stabilization, sampling, analysis, transport and proper disposal of all hazardous materials identified to be present at this Site.

This Site is not on the National Priorities List (NPL) and there are no nationally significant or precedent-setting issues associated with this Site.

II. SITE CONDITIONS AND BACKGROUND

A. Site Description

1. Removal Site Evaluation

The Site is located at 704-738 Doremus Avenue, Newark, New Jersey, 07105. The Site is situated in an industrial area in the Iron Bound section of Newark and consists of a large manufacturing building located on 8.5 acres. Before 1952, an ink manufacturer occupied this Site (International Printing Ink, Division of Interchemical Corporation, now part of Inmont Corp.). From 1952 to approximately 1991, Central Steel and Drum operated a drum reconditioning business. After vacating the property, a container shipping operation leased the property. According to NJDEP, the property has been abandoned since 1994.

The Site is situated on filled wetland. On the south end of the property, bordering one side of the property, is an existing wetland where drums have been observed. To the west, along Doremus Avenue, are railroad tracks. The Site, other than the main building, is gravel/weed covered filled vacant land.

An ERA performed by EPA on March 14-15, 1997, determined that approximately 500 drums of flammable, corrosive, possible water reactive, incinerator ash and sand blasting materials are abandoned on the Site. In total, approximately 50,000 gallons of hazardous wastes are estimated to be abandoned throughout the building/site (approximately 35% are solid wastes). Information regarding hazardous wastes at the Site are based upon container labels, hazcatting and historical documents identified during the ERA.

The Site consists of one main building (previously several buildings that are now interconnected). It has been used as a commercial dumping ground (evidenced by truck tires, construction debris, etc.). The property is partially fenced and there are no gates at the entrance. However, vehicles cannot enter the property, since there are four large concrete blocks (approximately 3 feet high) barring entry.

The production building is 200ft x 500ft of masonry construction with a metal truss roof. The building is in deteriorated condition and the roof leaks. All utilities have been turned off, so there is no fire suppression system available in the building. The building was found to be unsecured and there is evidence of vandalism, dumping and public entry. In a trailer on the property, it appears that someone is using this as shelter.

2. Physical Location

The Site is located at 704-738 Doremus Avenue, Newark, Essex County, New Jersey, 07105. The Site consists of a large production building on a site occupying 8.5 acres and is situated in a highly industrialized area.

The Site is adjacent to other industrial facilities. Within 1.5 miles of the Site are residential areas, industry, commercial properties, commuter/freight railroad lines and major city arterials.

Due to the industrial nature of the area around the Site, the 1990 population census statistics within a 1.0 mile radius of the Site are as follows: population is 26 persons comprised of 30.8% white, 23.1% Hispanic, 30.8% African American and 19.2% other. However, due to the residential areas bordering the industrial area within 1.5 miles, the 1990 population census statistics jump rather significantly. The census statistics within a 1.5 mile radius of the site are as follows: population is 7,023 persons comprised of 77.2% white, 29.5% Hispanic, 17.9% African American and 4.5% other. Adding racial populations, statistics provided above will produce a sum in excess of 100%. This may be due to individuals reporting themselves as belonging to two or more backgrounds. The majority (4,078) of the population in the 1.5 mile radius is in the age group of 20-49 years; median household income is $12,467. The 1,851 households are comprised of 38.7% owner occupied and 61.3% renter occupied.

3. Site Characteristics

The Site's production building is one story (30ft to trusses) and consists of external masonry walls with a metal roof. The building is in poor shape and the roof leaks. The building is approximately 200ft x 500ft in size. The building has no fire suppression system, since all the utilities in the buildings have been disconnected.

The building was found to be unsecured and there is evidence of vandalism, dumping and public entry. There are drains in the buildings, but they are hidden under the debris. An estimated 50,000 gallons of hazardous wastes are abandoned throughout the various

containers on-site. Central Steel & Drum received drums from various industries ranging from food to paint manufacturing. It's reconditioning operations involved incineration, sandblasting and repainting. There are approximately 750 drums of waste on the property. Approximately 50 percent contain acids, flammables, water reactive, paints and other waste materials. The remaining 50 percent contain incinerator ash. Incinerator ash was used as fill on the property. The main hazardous constituent in the ash is lead. Random XRF screenings indicate lead contamination above the 10,000 ppm range at certain locations throughout the property.

4. Environmental Release/Threatened Release of a Hazardous Substance, or Pollutant or Contaminant

The following compounds have been identified at the Site:

Substances Identified	Statutory Source for Designation as a Hazardous Substance
Waste Corrosive Liq NOS	RCRA § 3001
Paint Related Materials	RCRA § 3001
Heavy metals (lead most prevalent)	RCRA § 3001
Waste Flammable Liq NOS	RCRA § 3001

These hazardous substances are acutely and chronically toxic, corrosive, and/or flammable.

The potential health effects from these compounds are identified below:

Potential Health and Toxicological Effects

Material	1	2	3	4
Incinerator Ash	x			x
Water Reactive			x	
Lead Contaminated Soil/Sand	x			x
Acids/Caustics NOS		x	x	x
Paint Related/Flam NOS Materials	x		x	x

1 - Liver Damage
2 - Respiratory Damage
3 - Eye, Skin, or Respiratory irritant
4 - Toxic by inhalation, skin absorption or ingestion

In addition, there are other substances that meet the RCRA definition for the characteristics of corrositivity and flammability as outlined in 40 CFR 261. The following is a partial list of the RCRA corrosive and flammable substances.

Substances Identified
Thinners
Anti-Freeze
Solvents
Adhesives/Resins

5. NPL Status

At the present time, the Site is not on the NPL and there are no efforts to include this Site on the NPL.

B. Other Actions to Date

1. Previous Actions

EPA issued a Consent Agreement and Final Compliance on November 15, 1983, for a number of RCRA violations and also required the facility to conduct an investigation of contamination and develop a remediation program under the direction of NJDEP. Monitoring wells were installed and sampling data was produced. This case became inactive in 1985. Preliminary Assessment was conducted by NJDEP on March 5, 1985. The FIT Team conducted a site inspection report on February 14, 1986. The Site was referred on May 9, 1997, to EPA by NJDEP almost immediately following notification by the City of Newark.

2. Current Actions

On March 14-15, 1997, the EPA, NJDEP and Newark Office of Emergency Management (OEM) conducted an ERA and confirmed the presence of the materials described earlier in this memorandum.

During the week of June 2, 1997, EPA conducted a more detailed inventory of the materials abandoned at the Site. This action included mapping, chemical label identification and the numbering of drums.

C. State and Local Authorities' Roles

1. State and Local Actions to Date

State actions on the Site date back to 1981-82, when a series of NJDEP field investigations prompted Central Steel Drum to receive a notice of prosecution for illegal disposition of hazardous chemical waste on the premises. The Site was reinspected by NJDEP in September 1983 and November 1984, revealing that no significant progress had been made in clean-up operations.

On October 1, 1996, the City of Newark foreclosed on the 704 Doremus Avenue property. On March 9, 1997, the City of Newark notified the NJDEP of the abandoned nature of the Site and the presence of hazardous materials. On March 9, 1997, NJDEP verbally referred the Site to EPA.

2. Potential for Continued State/Local Response

Neither NJDEP or local government have the resources available to do the necessary removal action at the Site. These organizations will act in a supporting role throughout the removal action.

III. THREATS TO PUBLIC HEALTH OR WELFARE OR THE ENVIRONMENT, AND STATUTORY AND REGULATORY AUTHORITIES

A. Threats to Public Health or Welfare

Hazardous substances, pollutants or contaminants presently stored at the Site present a threat to the public health and welfare as defined by Section 300.415(b)(2) of the National Contingency Plan (NCP), in that there is a high potential for releases to occur. Many of the materials on the Site are toxic, flammable and/or corrosive and present a risk for direct human contact. Some of the materials are incompatible if mixed and present the threat of a runaway chemical reaction. The Site is located in an industrial area and is directly adjacent to railroad commuter and freight lines, as well as major traffic arterials and within 1.5 miles of residential areas.

An estimated 50,000 gallons of hazardous wastes are abandoned throughout the Site and are stored in an unsafe manner. The areas where these materials are stored are not maintained in a temperature controlled environment, which only heightens the number of drums that rupture, leak and continue to release vapor emissions. Some of these drums are leaking, while most are currently in marginal to fair condition and they will continue to deteriorate. Additionally, these containers are being stored without regard to compatibility, which will only heighten the chance of accidental release. Direct contact with the materials

abandoned at the Site, as a result of fire or vandalism, would present an immediate threat to the individuals involved, as well as nearby residents and businesses. The condition of materials at the Site and proximity of other commercial, industrial and residential areas, as well as to major traffic arterials, contribute to the possibility of direct human contact.

Due to the presence of flammable liquids and waste corrosives, the threat of fire at the facility does exist. This fire threat is enhanced by vagrants who live at the facility. Should a fire occur, it could spread across the facility and involve most of the material found at the Site. The toxic fumes created by the uncontrolled combustion of these materials could impact the surrounding population, possibly necessitating the evacuation of the surrounding population and the closure of city roads, rail lines and arterials. Many of the materials present are unknowns. Therefore, the complete effects of acute or chronic exposure from the fumes released in an uncontrolled release, cannot be predicted.

B. Threats to the Environment

Waste material has the potential of flowing directly into ditches which empty into the Newark Bay. Run-off from rain or fire fighting efforts could allow waste material to flow directly into Newark Bay. Due to the presence of flammable liquids and other flammable/combustible materials such as oil, grease, paints, lacquers and solvents, the threat of fire at the facility does exist which may result in further destruction of the wetlands.

IV. ENDANGERMENT DETERMINATION

Actual or threatened releases of hazardous substances from the Site, if not addressed by implementing the response action in this Action Memorandum, may present an imminent and substantial endangerment to public health, welfare and the environment.

V. PROPOSED ACTIONS AND ESTIMATED COSTS

A. Proposed Actions

1. Proposed Action Description

The objective of the removal action is to eliminate the threat of exposure through direct human contact caused by a release of the hazardous materials at the Site. To date, the City of Newark has secured entrance to the facility. However, the Site is

not secured from vagrants looking for entry into the building, heightening the need for an expedited response action. The proposed removal actions will include:

i. Stabilize and stage containers on the Site.
ii. Remove areas of obvious contaminated soils/ash piles.
iii. Sample and conduct analysis of wastes.
iv. Preparation of waste streams for shipment.
v. Removal of asbestos contaminated materials/debris as required to search for buried CERCLA hazardous waste.
vi. Transportation and disposal of all hazardous wastes in accordance with EPA's CERCLA Off-Site Disposal Policy.
vii. Conduct thorough soil sampling to determine the extent of contaminated soil for the possibility of removal under an additional removal action.

The selected mode of transportation and method of disposal will be based on the analytical data.

2. Contribution to Remedial Performance

The proposed action will contribute effectively to any long term remedial action with respect to the release or threatened release of hazardous substances. This removal action is consistent with any future long-term remedial action undertaken at the Site.

3. Description of Alternative Technologies

Alternative technologies will be considered so long as they prove to be cost effective and efficient.

4. Engineering Evaluation/Cost Analysis (EE/CA)

Due to the time-critical nature of this removal action, an EE/CA will not be prepared.

5. Applicable/Relevant & Appropriate Requirements (ARARs)

ARARs within the scope of the project, including RCRA and CERCLA regulations that pertain to the disposal of hazardous wastes, will be met to the extent practicable.

6. Project Schedule

Once funding is approved through this Action Memorandum, the removal action can be initiated immediately. Stabilization, inventory, sampling, analysis and waste categorization of materials could begin immediately. Transportation and disposal would occur shortly thereafter, with sampling for soil contamination to follow.

B. Estimated Costs

1. Extramural Costs	
Regional Allowance Costs: (Total clean-up contractor costs include labor, equipment, materials, and laboratory disposal analysis)	$650,000
Other Extramural Costs not Funded From the Regional Allowance:	
Total, START, including multiplier costs	$ 50,000
Subtotal, extramural costs	$700,000
Extramural Costs Contingency (20% of subtotal, extramural costs)	$140,000
TOTAL, EXTRAMURAL COSTS (rounded to nearest $1,000)	$840,000
Intramural Costs	
Direct	$ 36,000
Indirect	$ 52,000
TOTAL, INTRAMURAL COSTS	$ 88,000
TOTAL, REMOVAL PROJECT CEILING	$928,000

VI. EXPECTED CHANGE IN THE SITUATION SHOULD ACTION BE DELAYED OR NOT TAKEN

Delayed action or no action could result in the release of hazardous substances into the environment, thereby exposing the nearby residents and employees of the surrounding industries to hazardous substances and causing contamination of the soil, groundwater and nearby waterways. Due to the lack of lighting and inadequate security on the Site, the potential for unrestricted access to the property, due to vandalism or transients, could expose individuals by direct contact.

VII. OUTSTANDING POLICY ISSUES

None.

VIII. ENFORCEMENT

Efforts will be made to identify any viable Potentially Responsible Parties (PRPs) to assume responsibility for the cost of the clean-up. The On-Scene Coordinator will work with the Program Support Branch, the Office of Regional Counsel and the NJDEP in an attempt to locate viable PRPs to recover clean-up costs.

IX. RECOMMENDATION

This decision document represents a selected Removal Action for the Central Steel Drum Site, 704 Doremus Avenue, Newark, New Jersey, 07105. It was developed in accordance with CERCLA as amended and is consistent with the National Contingency Plan (NCP). This decision is based on the Administrative Record for the Site. Conditions at the Site meet the NCP Section 300.415(b)(2) criteria for a removal action.

This Action Memorandum, if approved, will authorize a total project ceiling of $928,000, with a mitigation ceiling of $840,000. The estimated costs for this project are within the FY-97 Regional Advice of Allowance. Please indicate your approval for the Central Steel Drum Site removal action, pursuant to your authority delegated by Assistant Administrator J. Winston Portor, May 25, 1988, Redelegation Memorandum R-14-1-A.

Approved: _____ Date: 7/8/97
Jeanne M. Fox
Regional Administrator

Disapproved: _____ Date: _____
Jeanne M. Fox
Regional Administrator

cc: (after approval is obtained)

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